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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

September 30, 2020

VIA ECF

The Honorable Paul A. Crotty United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Michael Paulsen, 19 Cr. 660 (PAC)

Dear Judge Crotty:

The Government respectfully requests that the Court enter the attached protective order, which defense counsel for defendant Michael Paulsen has signed. The Government requests entry of this order because it intends to provide to the defendant, pursuant to Federal Rule of Criminal Procedure 16, unredacted versions of certain documents that contain personal identification information and other private, sensitive, and confidential information.

Respectfully submitted,

Audrey Strauss Acting United States Attorney

By: <u>/s/</u>_____

Elinor Tarlow / Daniel Wolf Assistant United States Attorneys

(212) 637-1036 / 2337

CC: Joseph Sorrentino, Esq.